

# EXHIBIT C

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)
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This document relates to:

*Abel, et al. v. Islamic Republic of Iran (1:18-CV-11837) (GBD) (SN)*

**DECLARATION OF FAMILIAL RELATIONSHIP**

I, Antonia Torres Ayala, declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. My name is Antonia Torres Ayala, and I am the mother of Ana M. Centeno, who died on September 11, 2001 when the World Trade Center collapsed. I submit this Declaration for the purpose of demonstrating that Julio Masa Lebron was the functional equivalent of Ana M. Centeno's father.
2. While Julio Masa Lebron is not Ana M. Centeno's biological father, for the reasons set forth below, Julio Masa Lebron should be deemed the functional equivalent.
3. In 1968, Julio Masa Lebron, my husband for over fifty years, first met my daughter Ana M. Centeno, who we affectionately called "Mel," when we started dating. Mel was only 6 years old at the time.<sup>1</sup>
4. A year later in 1969, we all moved in together as a family along with our other children and lived in Jersey City, New Jersey.
5. I've always considered Julio as Mel's father and Julio has always considered Mel his child, along with Mel's other siblings. Mel and her other siblings are his

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<sup>1</sup> My husband and I have been together for over fifty years and we were legally married on May 5, 1990.

children in every way, especially because Mel's biological father, who lived in Puerto Rico, was not in her life, did not financially support her, and passed away when Mel was 15 years old.

6. While I worked occasionally, Julio was the main provider and the primary financial supporter in our family. Julio maintained Mel along with myself and Mel's other siblings and also filed income tax returns with Mel and other siblings as dependents.

7. In addition to this financial support, Julio treated Mel like his daughter, emotionally and socially. Julio would give them advice (and, of course, discipline) like any loving father and as to the outside world, there was no question that Mel and her other siblings, were his children.

8. He taught Mel how to ride a bike and drive a car. He enjoyed taking Mel and other siblings to the park and our family camping trips as well as to the arcade in Long Branch, New Jersey. When Mel was older, her relationship with her stepdad as father and daughter remained.

9. Mel lived with us until she became a young adult and moved out around 1984 when she was in her early 20s.

10. Even though she no longer lived at our family home, she moved close by in New Jersey and she would visit me and her stepdad often.

11. In 1998, Julio and I moved to Puerto Rico where Mel continued to visit us often. She also started to financially help us when we needed it, such as when we were buying our house in Puerto Rico.

12. On September 11, 2001, Mel was taken from our family.

13. We held on hoping Mel had escaped. Unfortunately, after a few days, and knowing that her car was still in the same parking space she had left it, we had to accept the fact

that Mel was one of the victims and shortly thereafter held a funeral in her name. It was a difficult loss for our entire family including Julio and we treasure her memories.

14. In sum, Ana M. Centeno's, my daughter, was very much Julio Masa Lebron's daughter and they considered each-other to be father and daughter in every way.

15. Julio was in her life since she was a small child, lived with her entire childhood, supported her financial and emotionally as a father, and will miss her always as a father who lost his daughter. *See Exhibit 1.*

*[intentionally left blank]*

Executed on: 8/14/19

Name (Signature): Antonia Torres Ayala

Name (Print): Antonia Torres Ayala

# EXHIBIT 1











